



Comprehensive content security for video operators™

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Federal Communications Commission
Office of the Secretary

Widevine Technologies
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Seattle, WA 98164

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Chairman Martin,

For the last few years, the cable industry, the Consumer Electronics Association and the Federal Communications Commission have been working to define and enforce separable security in the cable television industry in an effort to break the bonds of traditional conditional access providers. During this period, next generation video service providers, namely telecommunications and internet service providers, have successfully used Widevine Technology's separable security solution for secure delivery of multimedia content.

Widevine is pleased to inform you that our Cypher suite of security solutions have delivered "downloadable security" for numerous multimedia service operators since 2001. Widevine's proven solutions further enable the cable television industry to seamlessly implement downloadable security to a wide range of consumer devices

Since 1999, Widevine has enabled the secure delivery and consumption of broadcast and video-on-demand content on two-way networks. Widevine was the first content security company in the industry to deliver a downloadable security solution to market. Today, over 120 service operators worldwide use Widevine's separable security solutions.

Architecturally, Widevine achieves this separation using a component called a Virtual Smartcard client. Operators that utilize the Virtual SmartCards to protect consumer devices renew the content security in a matter of minutes, depending on the size of the network. The downloadable and renewable nature of the Virtual Smartcard enables Widevine to maintain a Hollywood studio-approved level of content security for distributed linear broadcast, video-on-demand, streamed media and file downloads. Designed for flexibility and affordability, Widevine is able to integrate a Virtual Smartcard client on a device in a very short period of time. Today, Widevine supports major IP-enabled set top box, personal video recorder, and PC consumer devices.

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Furthermore, Widevine offers the cable industry a low-cost solution for separable security. Since no additional hardware components are required with the Widevine solution, consumer device manufacturers can keep device costs low. Since Widevine's Virtual SmartCard client is integrated and deployed with a wide range of devices, operators have the flexibility and control to choose the consumer device that best meet's their content security and business needs.


The Widevine Cypher suite of content security solutions is widely available to the consumer device and cable industries. With respect to the Commission's mandate of "common reliance," Widevine's solutions have been generally available for worldwide licensing to any operator and consumer device manufacturer on a reasonable and non-discriminatory manner for years while utilizing industry standards for encryption.

Today, Widevine is in active discussions with the major cable MSOs in the US and they are aware of the value Widevine can offer as they migrate to digital and two-way networks.

Further delays of the industry to preclude "downloadable" security into new and legacy devices will continue to propagate the duopoly environment that has hindered innovation and competition for so long. Widevine respectfully requests the Commission consider the availability, severability and compliance with common reliance that Widevine offers today.

We welcome any further inquiries you may have regarding Widevine's solutions.

Kind Regards,



Brian Baker
CEO
Widevine Technologies

CC: Monica Desai, Chief of the Media Bureau; Heather Dixon, Legal Advisor to Chairman Martin